REMARKS

The Applicants appreciate the thorough examination of the present application that is reflected in the Official Action of December 10, 2004. Applicants respectfully submit that all of the pending claims are patentable in light of the above amendments and for at least the reasons that will now be explained.

Amended Claims 74, 80 and 86 Overcome the Rejections Under Section 112

Claims 74-81 and 86 stand rejected under 35 U.S.C. § 112, second paragraph. Claims 74, 80 and 86 have been amended for to overcome the state rejection thereof based on 35 U.S.C. § 112, second paragraph. Claims 75-79 were rejected based on their dependency on Claim 74, and therefore the rejection of Claims 75-79 under § 112 has also been overcome by the amendments to Claim 74. Claim 81 has been canceled. Accordingly, Applicants request withdrawal of the rejections under 35 U.S.C.§ 112, second paragraph.

Because these claims have only been amended to address the stated § 112 rejections, and not to overcome prior art, the full range of equivalents is therefore available.

Amended Independent Claims 45, 82 and 87 Are Patentable Over Hu

Claims 45, 82 and 87 stand rejected under 35 U.S.C. Sec. 102(e) as anticipated by U.S. Patent No. 6,751,220 to Hu.

Independent Claims 45, 82 and 87 are directed to techniques for serving files in a computer network.

In particular, for example, amended independent Claim 45 recites (emphasis added):

> 45. A method of serving objects in a computing network, the method comprising:
> receiving a request for an object stored on an intelligent storage system, the request being received by a web server, and the intelligent storage system comprising a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices;

evaluating the request based on criteria;

if the criteria are met, redirecting the request to the control unit of
the intelligent storage system; and

if the criteria are not met, serving the stored object via the web
server.

Accordingly, requests to a web server can be redirected to the control unit of an
intelligent storage system, and the control unit is configured to map requests to the storage
device. (Specification, page 6, lines 16-18.)

Hu does not teach or suggest redirecting a request to the control unit of an intelligent
storage system as recited, for example, in Claim 45. In contrast, Hu proposes a redirect mode
that returns to the requesting client whatever information is required to enable the client to
establish a direct connection with the content server. (Hu, col. 3, lines 8-10.) The content
servers 106 in Hu provide the content sought by the content request directly. (Hu, col. 4, lines
33-34.) Hu also proposes a proxy mode in which a proxy acts on behalf of the client by
forwarding the client request to a content server for servicing and then returning the results of the
servicing to the client. (Hu, col. 3, lines 5-8.) Therefore, Hu does not teach or suggest all of the
recitations of Claim 45.

Moreover, Hu explains that, in some cases, a direct connection between the content
server 106 and a client 104 would result in significantly more efficient communication. (Hu, col.
12, lines 20-24.) Therefore, Hu teaches away from redirecting the request to a control unit that
determines a mapping for the request to another storage unit (e.g., the control unit of the
intelligent storage system). Hu provides examples of situations in which a direct connection
with the content server 106 may result in more efficient communication: 1) when the client 104
and the content server 106 are physically located within a few miles of each other on the East
coast while the network request manager 102 is located on the West coast; 2) when the content
server 106 and the client 104 are connected via a high-speed network link and both share a low-
speed link with the network request manager 102; and 3) when the request is for a network

intensive interactive application where acting in a proxy mode would be too burdensome in terms of network bandwidth. (Hu, col. 12, lines 25-40.)

For at least these reasons, Applicants respectfully submit that Claim 45 is patentable over Hu. Independent Claims 82 and 87 contain similar features to Claim 45, and are submitted to be patentable over Hu for the reasons provided above for Claim 45. Dependent Claims 46-73, 83-85 and 88-95 are patentable at least per the patentability of the claims from which they depend.

Amended Independent Claims 74, 86 and 96 Are Patentable Over Hu.

Independent Claims 74, 86 and 96 stand rejected under 35 U.S.C. § 102(e) over Hu.

Claim 74 recites as follows (emphasis added):

> 74.   (Currently Amended) A method of creating a link to an object, the method comprising:
> receiving a request for a particular object in <u>an intelligent storage system comprising a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices;</u>
> evaluating characteristics of the particular object;
> creating a redirect link on one or more web servers from which the particular object may be requested if the evaluated characteristics of the particular object meet criteria, <u>the redirect link being configured to redirect the request to the control unit of the intelligent storage system;</u> and
> creating an object serving link on the one or more the web servers if the evaluated characteristics of the particular object do not meet the criteria.

Hu does not teach or suggest a redirect link that is configured to redirect the request to the control unit of the intelligent storage system as recited in Claim 74. As discussed above, Hu proposes a redirect mode that returns to the requesting client whatever information is required to enable the client to establish <u>a direct connection with the content server</u>. (Hu, col. 3, lines 8-10.) Hu explains that the direct connection with the content server may result in significantly more efficient communication, (Hu, col. 12, lines 19-34). Hu teaches away from a redirect link that is

configured to redirect the request to an intermediate device, such as the control unit of the intelligent storage system as recited in Claim 74.

For at least these reasons, Applicants submit that Claim 74 is patentable over Hu. Independent Claims 86 and 96 contain similar features to Claim 74, and are submitted to be patentable over Hu for the reasons provided above for Claim 74. Dependent Claims 75-79 and 97-98 are patentable at least per the patentability of the claims from which they depend.

Amended Independent Claims 80 and 99 are patentable over Hu

Claims 80 and 99 stand rejection under 35 U.S.C. § being anticipated by Hu.

Claim 80 recites (emphasis added):

> A method of serving large objects, the method comprising:
> receiving a request for a particular object stored on an intelligent storage system comprising a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices; and
> creating a redirect link on one or more web servers from which the particular object may be requested;
> serving the particular object from one of the plurality of storage devices via the control unit of the intelligent storage system using the redirect link or through a selected one of the web servers using the object serving link.

Hu does not teach or suggest serving the particular object from one of the plurality of storage devices via the control unit of the intelligent storage system using the redirect link as recited in Claim 80. In contrast, Hu proposes a redirect mode that returns to the requesting client whatever information is required to enable the client to establish a direct connection with the content server. (Hu, col. 3, lines 8-10.) Hu explains that the redirection may result in significantly more efficient communication. (Hu, col. 12, lines 19-34). Therefore, Hu teaches away from serving the particular object from one of the plurality of storage devices via the control unit of the intelligent storage system using the redirect link as recited in Claim 80.

For at least these reasons, Applicants submit that Claim 80 is patentable over Hu. Independent Claim 99 contains similar features to Claim 80, and is patentable over Hu for the reasons provided above for Claim 80. Dependent Claims 82-85 are patentable at least per the patentability of the claims from which they depend.

CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested.

Respectfully submitted,

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